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ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

Author of Report

Marlon McMillian
Environmental Scientist, Sr.
Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

Facility Information

United Launch Alliance- Decatur Operations (ULA)
1001 Red Hat Road NW
Decatur, AL 35601
EPA ID Number: ALR000009365
NAICS Code: 336414
Website: www.ulalaunch.com

Responsible Officials

Mr. John Jackson, SHEA Environmental Specialist

Inspection Participants

Mr. Jackson
Ms. Amanda Retherford, ULA
Mr. Cory Hannah, ULA
Mr. Chris Mata, ULA
Ms. Paula Whiting, USEPA Region 4
Mr. McMillian

Date of Inspection

12/3/2019

Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

Purpose of Inspection

To determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

Facility Description

United Launch Alliance (ULA) is a 50/50 joint venture between Lockheed Martin and the Boeing

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Company. ULA manufactures and assembles expendable launch vehicles for the United States government. ULA is currently manufacturing the Atlas V, Delta IV, Delta II and Vulcan launch vehicles. The facility is situated on 60 acres and has approximately 1.5 million square feet of production space. The facility currently employs 600 people and operates on two shifts (7am-3:30pm, 11pm-7am) seven days a week.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated January 24, 2019) ULA notified as a large quantity generator of hazardous waste, a small quantity handler of universal waste, and a used oil generator.

Findings

Ms. Whiting and I arrived at the facility at approximately 9:05 am. and announced our visit at the front gate. After an extensive conversation with the Security Director, we were granted at access to the facility at 10:15am by way of facility escort. Mr. Jackson greeted us and served as the facility representative during the inspection. During the opening conference, we presented identification and explained the purpose of the inspection. Following the opening conference, Mr. Jackson along with Ms. Retherford and Mr. Hannah provided a tour of the facility, during which time we conducted the inspection. ULA uses the following colored-coded management system for its satellite accumulation areas throughout the facility {Red- D001/D007, Yellow-Used Oil, Blue- D002/D007, and Gray-D001}

The following areas were inspected during the walkthrough:

Skin, Ring and Dome (SRD)
In this area, aluminum blanks (sheets and rings) are machined into the outer skin, dome and support rings of the launch vehicles. This area utilizes lathes, CNC machines and press breaks to achieve the desired shapes and structures necessary to assemble the launch vehicles. There are approximately 15 satellite accumulation areas (SAA) in the SRD area. While in this area, we also inspected the maintenance area and the printing area. There was a 55-gallon drum labeled "used oil" with a spring-loaded funnel that kept the drum closed. All of the SAA's in the SRD area were closed, labeled and in good condition. No areas of concerns were noted in this area.

Pay Load Assembly
Next, we moved to the pay load assembly area. In this area, the outer panels of the launch vehicles are spot painted as needed, sound dampening is applied, and port-hole windows are installed. The waste paint is accumulated in a blue 55-gallon drum. The drum was closed, labeled, and in good condition. There were three 30-gallon containers (red, blue and yellow) in this area. The containers were closed labeled and in good condition. There was also a 5-gallon bucket for aerosol cans designated as hazardous waste and a 3-gallon bucket for universal waste batteries. The containers were closed and labeled. No areas of concern were noted in this area.

Chemical Processing Area
The chemical processing area is located on the second floor of the production area. This area is where the aluminum plates are treated before assembly. There are fifteen tanks in this area; six of them have fume hoods and scrubbers to control the emissions in the area. There are two satellite accumulation areas on this floor; one near the chemical processing lines and one near the masking prep area. The SAA near the chemical processing area had one red 30-gallon container and a blue 30-gallon container present. There was one 55-gallon waste container for x-ray material. All of the containers were closed and labeled. The SAA near the masking area had three containers

present; two red 30-gallon drums and one blue 30-gallon drum. We noticed that red containers were nearing capacity and brought this to the attention of Mr. Jackson. He stated that he would eliminate one of the containers in order to avoid the potential of exceeding satellite accumulation capacity for this waste stream. No other areas of concern were noted in this area.

The following satellite accumulation areas were also inspected:

- Centaur Weld - one red and one blue container
- Delta Cryogenic Second Stage – one red and one blue container
- Perish Lab – one red container, one blue container, spent solvent 1-gallon
- Liquid Oxygen Lab – one red, one blue and one 55-gallon
- Spray-on Foam Insulation one red, one blue
- Integration and testing area Centaur V02- one red, V03-one red and one blue container
- SHEA – one red, one blue, one 55-gallon for expiring, one cardboard container for empty cylinders

All of the satellite accumulation containers in the above-listed areas were observed in good condition and labeled appropriately with the words "hazardous waste". No areas of concern were noted in any of these areas.

Hazardous Waste Storage Area

The hazardous waste storage area is located on the south side of the facility in a corrugated metal building. The area had the appropriate signage at every approach and was legible from 25 ft. The floor was bermed on all sides with a ramp into the area. The floor was free of any cracks or gaps. There were twenty-two cubic yard boxes for hazardous waste solids (D001, D007), three cubic yard containers of foam waste (D001, D007), three 30-gallon burlap sacks of hazardous waste (D001, D009). All of the containers were closed, labeled, dated, and in good condition. The oldest container was dated 9/14/19. The secondary containment appeared to be in good condition with no visible cracks or gaps. No areas of concern were noted in this area.

File review

When we completed the walkthrough portion of the inspection, we moved to the office area to conduct a review of required documentation. The following documents were inspected:

- Hazardous waste shipping Manifest
- Weekly hazardous waste inspection log
- Hazardous Waste Employee Training
- Contingency Plan & Quick Reference Guide
- Biennial Report
- Waste Minimization Plan
- Job Descriptions
- Job Titles

According to the file review, all other required documentation appeared to be accurate and complete.

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Summary

At the conclusion of the inspection, we met with Mr. Jackson and his team to discuss the results of the inspection. During the closing meeting, I prepared and provided a preliminary inspection report to him. Mr. Jackson acknowledged receipt by signing the form. We departed the facility at approximately 5:00 pm.

Signed

Marlon McMillan

Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

January 3, 2020
Date

Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

January 3, 2020
Date

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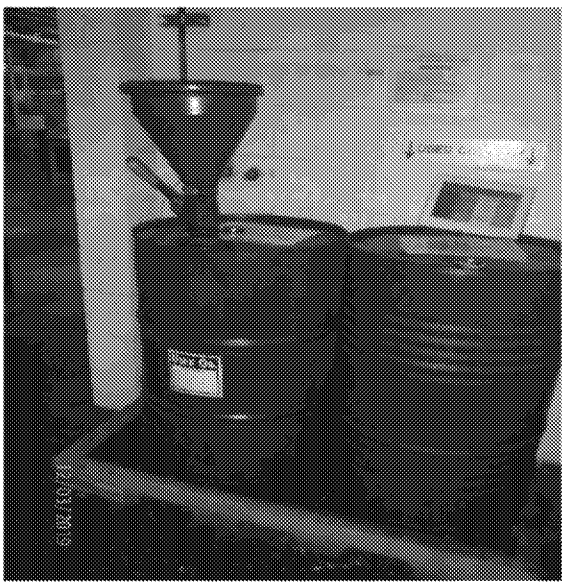
Photo Log

Skin Ring and Dome (SRD07) SAA

Skin ring and Dome (AM01) SAA



Skin, Ring and Dome (MAIN02) SAA

Chemical Processing Area (CP03)

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Chemical Processing Area (CP01)

Centaur Weld Area (CENTAURWELD02)

Perish Lab SAA

Liquid Oxygen Lab (LOX01) SAA

Hazardous Waste Storage Area

Hazardous Waste Storage Area

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 Universal Waste in the Hazardous waste Storage Area	 Safety, Health, Environmental Affairs (SHEA) SAA